

Cyrus Safa
Attorney at Law: 13241
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
Tel: (562)437-7006
Fax: (562)432-2935
E-Mail: rohlfig.office@rohlfiglaw.com

Leonard Stone
Attorney at Law: 5791
Shook & Stone, Chtd.
710 South 4th Street
Las Vegas, NV 89101
Tel.: (702) 385-2220
Fax: (702) 384-0394
E-mail: JGonzalez@shookandstone.com

Attorneys for Plaintiff JESUS E. RODRIGUEZ SANDOVAL

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JESUS E. RODRIGUEZ SANDOVAL)	Case No.: 2:20-cv-00065-DJA
Plaintiff,)	
v.)	STIPULATION TO EXTEND TIME
)	TO FILE MOTION FOR
ANDREW SAUL,)	REMAND/REVERSAL
Commissioner of Social Security,)	(SECOND REQUEST)
)	
Defendant.)	

Plaintiff Jesus E. Rodriguez Sandoval and Defendant Andrew Saul,
Commissioner of Social Security, through their undersigned attorneys, stipulate,
subject to this court's approval, to extend the time by 21 days from May 15, 2020
to June 9, 2020, for Plaintiff to file a Motion for remand/reversal, with all other

1 dates in the Court's scheduling order extended accordingly. This is Plaintiff's
2 second request for an extension. Counsel's co-worker attorney who shares
3 responsibilities in this case has an immediate family member who requires full
4 time care due to an emergency surgery this past week. Due to Counsel's heavy
5 briefing/hearing calendar, to accommodate Counsel's coworker family emergency,
6 Counsel needs additional time. This request is made in good faith.

7 DATE: May 14, 2020

Respectfully submitted,

8 LAWRENCE D. ROHLFING

9 /s/ *Cyrus Safa*

10 BY: _____

Cyrus Safa

11 Attorney for plaintiff

12 Mr. Jesus E. Rodriguez Sandoval

13 DATE: May 14, 2020

NICHOLAS A. TRUTANICH

14 United States Attorney

15 /s/ *Allison J. Cheung*

16 BY: _____

Allison J. Cheung

17 Special Assistant United States Attorney

18 Attorneys for defendant Andrew Saul

Commissioner of Social Security

19 [*authorized by e-mail]

20
21 DATED: May 18, 2020

22 IT IS SO ORDERED:

23 

24 UNITED STATES MAGISTRATE JUDGE

25 DANIEL J. ALBREGTS

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:20-CV-00065-DJA**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on May 14, 2020.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Cyrus Safa

Cyrus Safa
Attorneys for Plaintiff